

REMARKS

Applicants respectfully request that the Examiner reconsider the subject application as amended herein.

CLAIMS

Claims 74, 77, 81, 85, and 86 have each been amended to depend from claim 91 rather than the canceled claim 68. Moreover, claim 80 has been amended to depend from claim 91 rather than the canceled claim 79 and also to recite that the lead comprises beryllium-copper. No new matter has been added.

THE 35 U. S. C. § 102(E) REJECTIONS

The Examiner has rejected independent claim 68, and depending claims 79, 85, and 86 under 35 U.S.C. § 102(e) as being anticipated by Bellomo (US 5,419,712).

Claim 68

Claim 68 has been canceled.

Claim 79

Claim 79 has been canceled.

Claim 85

Amended claim 85 is allowable by virtue of its dependency on base claim 91, as well as the limitations it contains. Therefore, Applicants respectfully submit that claim 85 is allowable.

Claim 86

Amended claim 86 is allowable by virtue of its dependency on base claim 91, as well as the limitations it contains. For instance, Applicants find no reference in Bellomo to a flexible lead. In Bellomo, the word "flexible" is written at only

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1 Col. 7 line 46 with reference to a backing spring. In Bellomo, the module 36 has
2 contact pads 34. There is no description or suggestion that these pads are in any
3 way flexible, and are furthermore portrayed in FIG. 5 as being flush with the
4 module and therefore not flexible.

5 For any of these reasons, Bellomo does not anticipate claim 86, and claim
6 86 is therefore allowable.

7 **THE 35 U. S. C. § 103(A) REJECTIONS**

8 The Examiner has rejected depending claims 70-75 under 35 U.S.C. §
9 103(a), as being unpatentable over Bellomo in view of Cutchaw (US 4,293,175).

10 The Examiner has rejected claim 77 under 35 U.S.C. § 103(a), as being
11 unpatentable over Bellomo in view of Taniguchi (US 5,451,815).

12 The Examiner has rejected claims 80-83 under 35 U.S.C. § 103(a), as being
13 unpatentable over Bellomo.

14 The Examiner has rejected depending claims 87-88 under 35 U.S.C. §
15 103(a), as being unpatentable over Bellomo in view of Sonobe (US 4,636,022).

16 **Claims 70-75**

17 Claims 70-75 are each allowable by virtue of their dependency on new base
18 claim 91, as well as the additional limitations they contain.

19 Moreover, Applicants submit that there is no motivation, teaching, or
20 suggestion to combine Bellomo with Cutchaw. Applicants submit that claims 70-
21 75 are allowable for this reason as well.

22 Bellomo describes and portrays a connection system in which a module 36
23 has straight contact pads 34 "as known in the art" [FIG. 5, Col. 4 line 41]. A
24 circuit board has a contact housing 42 for receiving the contact pads 34. The
25 housing 42 has contacts 44 that specifically receive the contact pads 34. The

1 housing 42 has a backing spring 50 to press the contacts 44 against the pads 34,
2 and thus improve the electrical contact between the contacts 44, and the pads 34.

3 Cutchaw on the other hand describes a circuit package 92 mounted to a
4 circuit board (back panel) 94. The circuit package has edge contacts 98 about its
5 periphery. The edge contacts 98 have a loop portion, and an elastomeric material
6 10 interposed between the loops [Fig. 10] for maintaining alignment. In another
7 embodiment, the edge contacts 98 have a square ring-shaped portion, and an
8 elastomeric ring 110 interposed between the loops [Fig. 11] for resiliently
9 contacting terminal pads 106.

10 First, there is no suggestion or teaching in either Bellomo or Cutchaw to
11 combine Bellomo with Cutchaw. Second, there is no motivation to combine
12 Bellomo with Cutchaw. Bellomo describes a housing to receive the pads, while
13 Cutchaw describes leads directly contacting the circuit board. Bellomo describes
14 an inventive concept in which the circuit board base housing contacts have a spring
15 to further the contact between the pads (i.e. leads) and the base contacts, and
16 therefore has no interest in Cutchaw, which describes the leads resiliently
17 contacting terminal pads. Bellomo explicitly portrays his pads as being straight,
18 and explicitly states that his pads are "known in the art," thus clearly teaching
19 away from having a looped leads, and an elastomeric material between the loops,
20 to enhance a contact with the contacts. Applicants very respectfully submit that
21 holding that it is obvious to combine Bellomo with Cutchaw is an example of
22 picking and choosing a reference using hindsight. There is no motivation,
23 teaching, or suggestion to combine Bellomo with Cutchaw.

24 For any of these reasons, Applicants respectfully submit that claims 70-75
25 are not obvious over Bellomo in view of Cutchaw, and are allowable.

Claim 77

Amended claim 77 is allowable by virtue of its dependency on new base claim 91, as well as the additional limitations it contains. Therefore, Applicants respectfully submit that claim 77 is not obvious over Bellomo in view of Cutchaw, and is therefore allowable.

Claims 80-83

Applicants respectfully submit that claims 80-83 are allowable by virtue of their dependency on new base claim 91, as well as the limitations they contain.

The Examiner comments that it would have been obvious to use beryllium-copper as the preferred material, since beryllium-copper is suitable for its intended use as a matter of obvious design choice, but has provided nothing from the prior art to support his assertions. Having a goal of doing something is not the same as having a way to do it. In this case we have provided a specific novel way to accomplish a goal, and there is nothing in the prior art that would have suggested this specific way. The teaching or suggestion to make the claimed combination must be found in the prior art and not in the Applicant's disclosure (MPEP, section 2142, 2100-108 (Rev. 3)). Applicants respectfully submit that this is an example of impermissible hindsight.

For any of these reasons, Applicants respectfully submit that claims 80-83 are not obvious over Bellomo, and are allowable.

Claims 87-88

Claims 87-88 have been canceled.

CONCLUSION

Applicants respectfully request reconsideration of the rejection of the Application in view of the above amendments and the above remarks. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,
LEE & HAYES PLLC
421 W RIVERSIDE AVENUE SUITE 500
SPOKANE, WA 99201

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Kenneth Paley
Kenneth Paley
Reg. No. 38,989
(509) 324-9256

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TECHNOLOGY CENTER 2800